

# **U.S. DEPARTMENT OF ENERGY**

## **NEVADA OPERATIONS OFFICE**

### **POLICY**

**NV P 450.X1**

Approved: 8-20-98  
Review Date: 8-20-00

**Subject: COMPLIANCE WITH THE RESOURCE CONSERVATION AND  
RECOVERY ACT**

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#### **PURPOSE**

To set forth the DOE Nevada Operations Office (DOE/NV) policy of full compliance with the Resource Conservation and Recovery Act, as amended (RCRA); to set forth the guiding principle of full and open disclosure; and to document the division of responsibilities for RCRA compliance among DOE/NV, its Management and Operating Contractor, Bechtel Nevada (BN), other contractors, and site users.

#### **SCOPE**

This policy applies to all operations and activities at all DOE/NV sites and locations. All Federal, Contractor, and National Laboratory employees, as well as visitors and site users will follow this policy.

#### **POLICY**

All DOE/NV, contractor, and Nevada Test Site (NTS) user operations are to be conducted in full compliance with applicable federal, state, and local laws and regulations. No employee shall ever be given the impression that any mission, project, or operation is important enough to proceed in violation of a law or regulation. To this end, I am prepared to suspend any operation to avoid or eliminate a known noncompliance condition with regulatory requirements.

The Environmental Protection Agency, state, and local regulatory agencies provide independent regulatory and nonregulatory oversight of Department of Energy and contractor operations. I strongly endorse these roles and am personally committed to

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**INITIATED BY:**  
**Office of the Manager**

maintaining open and proactive relationships with these agencies. In all cases, we are to follow the guiding principle of full and open disclosure for all of our operations.

### **ROLES AND RESPONSIBILITIES**

The **DOE/NV Office of Assistant Manager for Environmental Management** is responsible for ensuring all contractor and user activities involving satellite accumulation areas and all solid waste storage, treatment, and disposal operations (including hazardous, mixed, and nonhazardous solid waste), waste minimization and pollution prevention are conducted in full compliance with the RCRA. This responsibility includes providing RCRA performance direction, conducting day-to-day oversight of contractor and user operations, and evaluating contractor performance for fee determinations. Program offices (i.e., Defense Programs, Environmental Management, etc.) shall continue to be responsible for program direction and funding for solid waste generating activities.

**BN**, as the Management and Operating Contractor, is responsible for ensuring all generation and management of hazardous, mixed, and nonhazardous solid wastes are in full compliance with RCRA for itself, all other contractors, and NTS users, excluding environmental restoration activities at off-site locations for which BN has no management and operating responsibility and economic development activities conducted by other entities pursuant to Section 3161 of the National Defense Authorization Act of Fiscal Year 1993.

Any and all contractors and users who generate solid waste at DOE/NV facilities are responsible for RCRA compliance. The policy set forth in this document applies to any and all such contractors and users who generate solid waste. Appropriate waste management activities, including waste minimization and pollution prevention, must be incorporated into the project's or activity's project planning.

### **DOE/NV SELF-ASSESSMENT PROCESS**

The accomplishment of all roles and responsibilities shall be evaluated through DOE/NV's assessment program, currently under development in accordance with the principles of integrated safety management.

G. W. Johnson